

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

FERDINAND GARCIA RODRIGUEZ

DEBTOR

CASE NO 13-06816/ESL

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S UNFAVORABLE
REPORT ON CONFIRMATION, DOCKET NO. 10**

TO THE HONORABLE COURT:

NOW COMES, FERDINAND GARCIA RODRIGUEZ, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed an unfavorable report on confirmation, docket no. 10, dated September 25, 2013.
2. On October 1, 2013, the debtor filed amended schedules "I" and "J" to cure the objection raised by the Trustee in his report, docket no. 10.
3. Furthermore, on the same date, the debtor submitted evidence of the "sick leave" compensation received, as requested by the Trustee.
4. Moreover, the debtor hereby respectfully submits that he did not had to file the 1040 PR forms for years 2009-2012, since the services rendered by the debtor were part of his salary received from his employer, Municipality of Cidra, which employer made all Federal and State tax deductions.
5. With this information debtor responds to the Trustee's report on confirmation, docket no. 10, dated September 25, 2013.

Page 2

Debtor's Reply to Trustee's Unfavorable Report
Case no. 13-06816/ESL

WHEREFORE debtor respectfully prays that Trustee's unfavorable recommendation be denied.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following participant: Ferdinand Garcia Rodriguez, debtor in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 7th day of October, 2013.

/s/ **Roberto Figueroa Carrasquillo**
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
PO BOX 186
CAGUAS PR 00726-0816
TEL (787)744-7699FAX (787)746-5294
EMAIL: rfigueroa@rfclawpr.com